

Arent Fox

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March 30, 2011

David J. Kozlowski

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VIA FEDEX

United States Bankruptcy Court
Attn: Clerk's Office
United States Federal Building and Courthouse
100 S. Clinton Street
Syracuse, NY 13261

Re: Mohawk Valley Nursing Home, Inc.
Chapter 11 Case No. 09-30389 (MCR), Adv. Pro. No. 10-50018 (MCR)
Request to Reopen Closed Adversary Proceeding

Ladies or Gentlemen:

The Official Committee of Unsecured Creditors of Mohawk Valley Nursing Home (the "Committee"), by and through its undersigned counsel, hereby requests that the adversary proceeding between the Committee and Main-Care Energy ("Main-Care"), Adv. Pro. No. 10-50018 (MCR) (the "Adversary Proceeding"), be reopened for the limited purpose of seeking entry of a corrective stipulation between the Committee and Main-Care.

The Committee and Main-Care reached a settlement to the Adversary Proceeding, which was approved by this Court on June 28, 2010. The settlement inadvertently included language affecting Main-Care's ability to collect a distribution on behalf of its filed proof of claim. However, before this was discovered and corrected, the Adversary Proceeding was closed. As a result of this inadvertently included language, Main-Care may suffer damages resulting from being excluded from any distribution. Concurrent with this letter, the Committee is filing a motion, on notice in the Adversary Proceeding, seeking Court approval of a corrective stipulation. In order to have such motion heard, the Adversary Proceeding must be reopened.

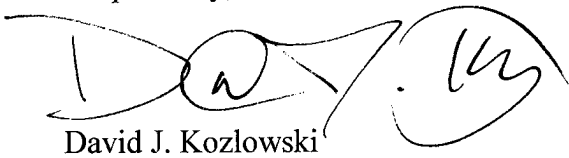
Section 350(b) of the Bankruptcy Code provides for reopening of a case "to administer assets, to accord relief to the debtor, or for other cause." 11 U.S.C. § 350(b). The decision to reopen a case is within the a court's discretion. *In re Chalasani*, 92 F.3d 1300, 1308 (2d Cir. 1996). Reopening a case does not give substantive relief, but merely grants the opportunity to request relief. *Chalasani*, 92 F.3d at 1307-08. The Committee asserts that cause exists to reopen the Adversary Proceeding for the limited purpose of allowing the Committee to request entry of an order approving a corrective settlement.

NYC/576180.1

Arent Fox

Kindly advise if any additional information or documentation is required.

Respectfully,

A handwritten signature in black ink, appearing to read 'David J. Kozlowski', with a large, stylized flourish at the end.

David J. Kozlowski

cc: Melissa Tobrocke, Esq. (via email)
Charles J. Sullivan, Esq. (via email)